

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

**WISCO DIVERSIFIED OF AMERICA,
INC.,**

Plaintiff,

vs.

**CIGNA HEALTHCARE, INC. AND
CONNECTICUT GENERAL LIFE
INSURANCE COMPANY, INC.,**

Defendants.

Civil Action No. 5:12-cv-00048-RLV-DSC

CONSENT PROTECTIVE ORDER

This Qualified Protective Order (“Order”) is presented to the Court pursuant to 45 C.F.R. 164.512(e) of the privacy standards promulgated pursuant to the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). The parties agree to comply fully with the terms and conditions of this Order to maintain the confidentiality of such information.

1. This Order shall apply to the protected health information of recipients of health care services contained in responses to document requests by any party, and any documents produced by any person or entity not a party to this litigation in response to a subpoena or otherwise, or deposition testimony during the proceedings in this action, such information hereinafter referred to as “Protected Health Information.” This information includes any protected healthcare information contained in documents or other information exchanged between the Parties, as well as documents submitted by Knauff Insurance Agency, in response to a subpoena or otherwise.

2. The Protected Health Information: (a) shall be used only in the course of the above-captioned court proceeding; (b) shall be disclosed to the Court and Court personnel who have need to read, review, or file the “Protected Health Information”; and (c) shall be disclosed only to the parties to this Court

proceeding, their counsel, or any staff member working for counsel, or any consultant or expert retained by counsel of the Parties, for purposes of this court proceeding.

3. Upon conclusion of this action, the Protected Health Information, and all copies thereof, shall either be returned to the party who produced the documents or shall be destroyed.

4. The parties agree to be bound by the conditions of this Order.

SO ORDERED.

Signed: October 25, 2012



David S. Cayer
United States Magistrate Judge



WE CONSENT:

s/ Phillip A. Harris, Jr.
Christopher J. Blake
NC Bar No. 16433
Phillip A. Harris, Jr.
NC Bar No. 39740
NELSON MULLINS RILEY &
SCARBOROUGH, LLP
4140 Parklake Avenue, Suite 200
Raleigh, North Carolina 27612
Phone: (919) 877-3800
Facsimile: (919) 877-3799
chris.blake@nelsonmullins.com
phillip.harris@nelsonmullins.com

*Counsel for Cigna Healthcare Inc. and
Connecticut General Life Insurance
Company, Inc.*

s/John M. Logsdon
Robert P. Laney
NC Bar No. 7850
John M. Logsdon
NC Bar No. 22173
McELWEE FIRM PLLC
906 Main Street
North Wilkesboro, NC 28659
Phone: (336) 838-1111
Facsimile: (336) 838-5069
blaney@mcelweefirm.com
jlogsdon@mcelweefirm.com

*Counsel for Wisco Diversified of
America, Inc.*